



26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

1. All grievances, complaints, or other correspondence relating to, regarding or arising out of the incidents alleged in the Amended Complaint, including, but not limited to, all grievances or complaints submitted by each Plaintiff to Department of Correction personnel, responses thereto, and any related correspondence between each Plaintiff and Department of Correction personnel.

REQUEST NO. 2:

2. All correspondence relating to, regarding or arising out of the incidents alleged in the Amended Complaint, including, but not limited to, any correspondence between friends or family members of each Plaintiff or other inmates and Department of Correction personnel.

REQUEST NO. 3:

3. Any statements, declarations, petitions, or affidavits relating to, regarding or arising out of the incidents alleged in the Amended Complaint and any statements, declarations, or affidavits of each Plaintiff, other inmates, or witnesses to the allegations in the Amended Complaint.

REQUEST NO. 4:

4. Any tests, reports, studies or any other documents relating to, regarding or arising out of the incidents alleged in the Amended Complaint.

REQUEST NO. 5:

5. All criminal history records for each Plaintiff from any other state besides Delaware for the past 15 years. *Objection. SEE D.O.C*

REQUEST NO. 6:

6. All medical records for each Plaintiff relating to, regarding or arising out of the incidents alleged in the Amended Complaint. *Objection, SEE D.P.C*

REQUEST NO. 7:

7. All medical records for each Plaintiff for the past 15 years.
Objection, SEE D.P.C

REQUEST NO. 8:

8. Any and all document(s) referenced or identified in Plaintiff's Responses to Interrogatories served contemporaneously herewith.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Eileen Kelly

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Attorney for Defendants

~~Date: March 3, 2007~~

Date

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